U.S. Department of Justice

United States Attorney
Eastern District of New York

JMH
F. #2019R00929

271 Cadman Plaza East
Brooklyn, New York 11201

January 27, 2021

By ECF and FedEx

John Carman, Esq.
666 Old Country Road
Garden City, NY 11530
Email: john@johncarmanlaw.com

> Re: United States v. Baimadajie Angwang
>   Criminal Docket No. 20-442 (EK)

Dear Mr. Carman:

Enclosed please find discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This production supplements the materials provided on December 23, 2020, and January 13, 2021. See ECF Nos. 30, 34. The government also requests reciprocal discovery from the defendant.

The materials produced today consist of a disc bearing Bates number ANGWANG-001460. This disc contains a video of the defendant's post-arrest invocation of rights, and his suspension from NYPD service. The disc is password protected, and will be sent to you by separate cover. Please contact me if you have any issues accessing the materials.

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If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Please be advised that, pursuant to the policy of the Office concerning plea offers and negotiations, no plea offer is effective unless and until made in writing and signed by authorized representatives of the Office. In particular, any discussion regarding the pretrial disposition of a matter that is not reduced to writing and signed by authorized representatives of

the Office cannot and does not constitute a "formal offer" or a "plea offer," as those terms are used in <u>Lafler v. Cooper</u>, 132 S. Ct. 1376 (2012), and <u>Missouri v. Frye</u>, 132 S. Ct. 1399 (2012).

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Very truly yours,

SETH D. DUCHARME
Acting United States Attorney

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By: /s/ J. Matthew Haggans
        J. Matthew Haggans
        Assistant U.S. Attorneys
        (718) 254-7000

        Scott A. Claffee
        Trial Attorney, National Security Division
        U.S. Department of Justice
        (718) 254-7000

Enclosure (via FedEx)
cc: Clerk of the Court (EK) (by ECF) (without enclosures)